



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

MEMORANDUM

DATE: June 22, 1992

SUBJECT: Request for a Removal Action at the Hillsdale Drum Site, Hillsdale, St. Helena Parish, Louisiana

FROM: Robert M. Ryan, P.E.
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Response/Investigation Section (6E-EI)

TO: Russell F. Rhoades
Director
Environmental Services Division (6E)

THRU: Charles A. Gazda
Chief
Emergency Response Branch (6E-E)

Site ID#: 2X

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the proposed removal action described herein for the Hillsdale Drum Site, Hillsdale, St. Helena Parish, Louisiana.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: LAD985214766
Category of Removal: Time-Critical

A. Site Description

1. Removal site evaluation

On February 12, 1992 the EPA Region 6 Emergency Response Branch (ERB) received a request for assistance from the Louisiana Department of Environmental Quality (LDEQ) concerning the improper storage of a number of drums at two locations near Hillsdale, St. Helena Parish, Louisiana. The manner of storage of the drums posed a significant fire and explosion threat. Drums of incompatible materials were stored next to each other,

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i.e., drums labeled oxidizer were stored next to drums with flammable liquids labels, drums with corrosive labels were stored next to drums with poisons labels, etc. Because of the potential for fire and explosion, the LDEQ has requested that the St. Helena Sheriff evacuate a family living in a house trailer approximately 75 yards from one of the storage locations.

EPA Emergency Response Branch and Criminal Investigation Division, EPA Technical Assistance Team (EPA-TAT), the Louisiana State Police, and LDEQ investigated the sites on February 13, 1992. At the site on J.P. Thomas Road (Site A) there were approximately 200 drums, both metal 55-gallon and 40-gallon fiber overpack drums stored outside a 40-foot van trailer. There were approximately 75 drums inside the van trailer. On the ground near the trailer were two piles of what appeared to be vermiculite packing material from the fiber laboratory overpack drums. There was also a pile of ash where it appeared that a number of drums had been burned (evidenced by the metal drum rings). The burn pile also had a number of partially-burned test tube and centrifuge vials in the ashes at the foot of the pile. Near the burn pile was a pile of numerous small containers which had hazardous materials labels, i.e., poison, flammable liquid, restricted-use pesticide, experimental pesticides, corrosive.

The investigation team also investigated a site on LA 441, (Site B) which was located in an abandoned tavern/nightclub. This location had approximately 500 drums and containers stored inside and another 15 drums stored outside behind the building. The drums inside had numerous hazardous materials labels and preliminary information obtained from LDEQ indicated that several of the drums contained corrosive materials (pH <1). The drums in the building were stored in a haphazard fashion and with apparent disregard for compatibility class. There is also a 40-foot van trailer on-site (B) with an unknown number of drums stored inside. Behind the building there is a fenced oxidation pond (for the facility septic system) containing a number of broken laboratory reagent bottles and indications of materials having been dumped and burned. When the investigation team arrived on-site at Site B, the Louisiana State Police had impounded a truck operated by the owner/operator of Site B with a number of drums labeled polychlorinated biphenyls (PCBs) inside. These drums had been initially stored at Site B and had been sent to a disposal facility which had returned the drums because the disposal facility was not permitted to dispose of PCBs.

On February 17, 1992, the Louisiana State Police informed the OSC of a third site (Site C) in a warehouse in Amite, Tangipahoa Parish, Louisiana. This site had 31 drums of the same type and markings as the other two sites, a pile of vermiculite packing material, and several plastic bags with "asbestos containing material" labels. Two 40-gallon fiber labpack drums, one with "Poison B Liquid, N.O.S." and the other with "Corrosive Liquid,

N.O.S." were discovered leaking. Key problems areas are the improper storage of numerous drums of hazardous materials, with incompatible materials being stored in close proximity; leaking drums of hazardous materials; fire and explosion threat; and potential improper disposal of hazardous materials. The site has not had any other site assessments or investigations performed under Superfund authority.

See previous Action Memorandum at Attachment 1.

2. Physical location

The Hillsdale Drum site (described as site B above) is located at Rural Route 1, Box 87, Amite, Louisiana, 70422. The site is on a small hill on the south side of Louisiana State Road 441, approximately 3/4 mile south of the town of Hillsdale (population approximately 150). There are two residences approximately 1/4 to 1/2 mile north of the site along SH 441. Land use surrounding the site is primarily rural, with cattle raised for dairy and beef production. Note that ERB has consolidated materials from sites A&C described above to this location.

3. Site characteristics

The Hillsdale Drum site allegedly results from the activities of four companies, Southern Environmental Services, PSC Environmental Services, Tecrep, Inc., and LabTech, Inc. These companies were licensed transporters of hazardous materials. From information gathered in the investigation, the companies allegedly collected hazardous wastes from different contractors for transport of the materials for disposal. Materials which could not be disposed of were allegedly stored in the van trailers or in the lounge/warehouse. There is a grand total of approximately 300 containers with materials in them, and an additional estimated 600 empty containers.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant.

The substance known on-site are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and further defined at 40 CFR § 302.4. Known substances are acetone (flammable liquid), fuming sulfuric acid (corrosive), metallic sodium (flammable solid), sodium hydroxide (caustic) and lab packs containing metaphosphoric acid, nitric acid, hydrochloric acid, drums containing PCBs, two labpacks containing biological hazards (medical wastes), there were several containers of restricted use pesticides and experimental pesticides with warning labels indicating that the pesticides were cholinesterase inhibitors. Additionally, there were containers marked with poison and flammable liquid D.O.T. markings.

There were several empty "glove bags" marked with "asbestos containing material" labels, and a pile of an unknown white powdery material and vermiculite mixed together. There was one drum marked as containing waste formaldehyde. Allegedly, individuals in the company would bring certain drums to the site, unpack the labpack drums, combine materials from the the labpacks together and take the combined materials for disposal. Once the containers had been emptied, allegedly the hazardous waste labels would be painted over to obscure the labels. Investigations have also discovered that some of the materials from the labpacks were allegedly emptied onto the burn pile and ignited. Once the glass containers of flammable and/or hazardous materials were emptied, allegedly the glass containers would be broken and dumped into other empty drums. Allegedly these drums would be relabeled with nonhazardous waste labels.

The major potential for future release from the site is through fire/explosion. Presently, the drums & wastes have been restaged, according to compatibility class, at Site B within the lounge/warehouse. Those drums in poor condition or in danger of leaking were overpacked into either metal or poly overpack drums according to the type of material being overpacked. If there were to be a fire/explosion, the fumes and smoke created by the fire would likely be toxic and tend to drift with the prevailing winds over the town of Hillsdale. Contingency Plans have been made with both the St. Helena Sheriff's Department and the Hillsdale Volunteer Fire Department for evacuation and fire fighting operations in the event of a fire/explosion.

5. NPL status

The Hillsdale Drum Site is not on nor proposed for the National Priorities List, and has not received a Hazard Ranking System Score.

B. Other Actions to Date

1. Previous actions

On February 12, 1992 the EPA Region 6 Emergency Response Branch received a request for assistance from the Louisiana Department of Environmental Quality (LDEQ) and the Louisiana State Police concerning an unknown number of drums at an abandoned lounge/warehouse near the City of Hillsdale, St Helena Parish, LA. Based upon the information provided by the LDEQ, the EPA Region 6 Regional Administrator granted verbal approval for a classic emergency removal action at the Hillsdale Drum Site.

A classic emergency removal action was initiated on February 13, 1992, and consisted of mobilizing contractors and beginning inventorying drums, consolidating drums and materials from three separate locations to the lounge/warehouse location (described

above as Site B), and staging the drums according to compatibility class. Once the drums were restaged, the lounge/warehouse was secured and a 24-hour armed guard posted. An Action Memorandum for those emergency actions is included as Attachment 1.

2. Current actions

EPA enforcement personnel organized a meeting on May 28, 1992 for potentially responsible parties (PRPs) whose hazardous substances, pollutants, or contaminants were believed to have been released at the Hillsdale and Marco of Iota sites. These PRPs were extended the opportunity to participate in the remainder of the removal action, which is to consist of the off-site disposal of the on-site hazardous substances, pollutants, and contaminants. Those PRPs were to notify EPA by close of business on June 10, 1992 if they intended to participate in completion of the action. EPA Emergency Response Branch will complete the actions described herein because the PRPs elected not to do so.

C. State and Local Authorities's Role

1. State and local actions to date

The Louisiana Department of Environmental Quality was notified of the site by an anonymous caller on February 5, 1992. LDEQ and the State Police started investigations of the J.P. Thomas Road site and the La Hwy 441 site on February 6, 1992. Initial investigations of the site indicated the presence of incompatible materials stored next to each presenting a fire and explosion hazard. LDEQ requested EPA assistance on February 12, 1992. At the same time, LDEQ requested that the Governor of Louisiana issue a notice of imminent endangerment posed by both the Hillsdale and Marco sites.

Once the Governor of Louisiana issued the notices, the LDEQ instructed the St. Helena Sheriff's Office to evacuate the family living near the J.P. Thomas Road site. The LDEQ is continuing investigations of the activities at the three locations under state RCRA authority.

The Louisiana State Police obtained search warrants and issued several arrest warrants in conjunction with their criminal investigation of the case. Entry into two the initial sites was made under the State Police Search Warrant authority, and entry into the Amite warehouse site was made under a "Consent to Search" agreement.

Due to the potentially multi-state nature of the criminal investigations, the Louisiana State Police requested assistance from EPA Criminal Investigation Division.

2. Potential for continued State/local response

The LDEQ, State Police and EPA Criminal Investigation Division are continuing their respective investigations. EPA assumed the lead in the removal actions. However, data collected from both analytical and PRP investigations are being shared by all parties involved.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

A. Threats to Public Health or Welfare

At the Hillsdale Drum site there is a total of approximately 900 drums. Inventory of lab pack drums (with packing list attached) show the following materials: nitric acid, chromic acid, sulfuric acid, sodium hydroxide, trichloroacetic acid, lithium hydroxide, calcium hydroxide, metallic sodium, phosphoric acid, hydrofluoric acid, and numerous organic acids. Additionally, two drums are labeled with "biological hazard" labels and contain medical wastes. HazCat analysis has indicated a number of drums which contain very caustic solutions ($\text{pH} > 14$). Not only do the drums present a threat of release and exposure in themselves, but the original haphazard storage of the drums presented the threat of fire and explosion due to incompatible substances being stored next to each other. Should a fire or explosion occur, toxic fumes would likely be produced which could potentially affect the town of Hillsdale, depending upon prevailing wind direction.

These waste materials present significant direct contact threats for humans. Dermal contact, inhalation, or ingestion may result in burns to exposed tissue, heavy metal poisoning, and damage to a variety of internal organs.

B. Threats to the Environment

On-site is an abandoned sewage oxidation pond associated with the lounge/warehouse septic system. Initial investigation of the pond indicated that waste materials may have been disposed of in

the pond. This was evidenced by the presence of a large number of broken glass containers in the pond. The pond has an overflow leading to an unnamed intermittent creek which flows into the Tickfaw River. There are no known endangered species near the site.

The facility's storage techniques for containerized material was inappropriate by accepted industrial safety standards and EPA regulations. Examples of such practices are the stacking of containers three high and the storage of incompatible materials in close proximity. Such storage posed a threat or contributed to actual release of the containerized waste to the local

environment. Site operating practices resulted in waste material being deliberately or accidentally released to the local environment. A notable example was the "burn pile" which contained the remnants of drums, smaller containers, and visible partially burned wastes.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances, pollutants, or contaminants from this site, if not addressed by implementing the actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The proposed actions are based on available information. Where practical, compatible materials will be bulked and disposal profile analysis will be obtained prior to transportation and disposal of the materials at an approved disposal facility.

Soil contamination associated with the oxidation pond is possible, and the extent of contamination is unknown at this time. The Emergency Response Branch will practice source control on the gross soil contamination. Estimated costs in this Action Memorandum do not reflect significant soil cleanup. If the proposed scope of work changes significantly because of soil cleanup, additional funds will be requested in a new Action Memorandum.

These proposed actions will mitigate the known threats posed by the site. It is anticipated that the actions will take approximately 45 days of on-site activities. Poor weather conditions will likely extend duration of on-site activities.

2. Contribution to remedial performance

As stated, the Hillsdale Drum Site has not received a remedial investigation and there is no proposed long-term remedial plan for the site. Removal investigation data will be provided for consideration in ranking the site for the NPL. However, the proposed source control actions will contribute to the efficient performance of any future remedial action.

3. Description of alternative technologies

No alternative technologies were considered.

4. Applicable or relevant and appropriate requirements (ARARs)

See Attached ARARs listing.

5. Project schedule

On-site activities to bulk materials and obtain disposal profiles are tentatively scheduled to begin on or about July 1, 1992.

B. Estimated Costs

EXTRAMURAL COSTS

Regional Allowance Cost:	Total
ERCS Costs:	\$ 520,000
Other Extramural Costs Not Funded From Regional Allowance:	
	Total
TAT, including multiplier	\$ 50,000
Total IAGs (USCG Strike Team)	\$ 20,000
Subtotal Extramural Costs	\$ 590,000
Contingency	\$ 120,000
TOTAL EXTRAMURAL COSTS	\$ 710,000

INTRAMURAL COSTS

Intramural Direct Costs	\$ 25,000
Intramural Indirect Costs	\$ 36,000

TOTAL INTRAMURAL COSTS \$ 61,000

APPROXIMATE PRIOR REMOVAL ACTION COSTS \$ 269,000

TOTAL REMOVAL PROJECT CEILING..... \$1,040,000

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE
DELAYED OR NOT TAKEN

Should the actions described in this Action Memorandum be delayed or not taken, the drums stored at the Hillsdale Drum Site

would continue to pose a fire and explosion threat to the nearby residents of the Town of Hillsdale. The actions described herein are necessary to remove and dispose of the materials on-site.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT ADDENDUM

See Attached ENFORCEMENT ADDENDUM

IX. RECOMMENDATION

This decision document represents the selected removal action for the Hillsdale Drum Site, Hillsdale, St. Helena Parish, Louisiana, developed in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by Superfund Amendments and Reauthorization Act (SARA), 42 U.S.C. § 9601 et seq., and not inconsistent with the National Contingency Plan (NCP), 40 CFR Part 300. This decision is based on the Administrative Record for the site.

Conditions at the site meet the NCP Section 300.415(b)(2) criteria for a removal and I recommend your approval of the proposed removal action. The total project ceiling, if approved, will be \$1,040,000. Of this, an estimated \$520,000 comes from the Regional Allowance. You may indicate your approval or disapproval by signing the appropriate space below.

APPROVED:



DATE:

6/24/92

DISAPPROVED: _____

DATE: _____

ATTACHMENTS

ARARs Listing
Enforcement addendum
Marco of Iota site Action Memorandum

CONFIDENTIAL DOCUMENT

LOCATED IN A SEPARATE, CONFIDENTIAL FILE

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